

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA,
SOUTHERN DIVISION**

DARRYL ANDERSON, et al.,

Plaintiffs,

v.

PERDUE FARMS, LLC.

Defendant.

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**CIVIL ACTION NO.
1:06-cv-1000-MEF**

NOTICE OF FILING ADDITIONAL CONSENTS TO JOIN

Plaintiffs give notice of filing the attached Notices of Consent to Join executed by, BENNIE WALKER, RAY CHARLES STARKS, JACQUELINE STANFORD, TYRONE MURRELL, GWENDOLYN MICHELLE LEE, ANNIE MARTHA HODGE and CAROLYN COCHRAN, similarly situated employees to Plaintiffs, who likewise are or were subjected to the illegal pay practices at issue, and who wish to join the above captioned lawsuit.

Dated: March 6, 2007

Respectfully submitted,

THE COCHRAN FIRM, P.C.

/s/ Robert J. Camp

ROBERT JOSEPH CAMP

505 North 20th Street, Suite 825

Birmingham, Alabama 35203

(205) 930-6900-Telephone

(205) 930-6910- Facsimile

Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on March 6, 2007, I electronically filed the above Notice with the Clerk of the District Court using CM/ECF System, which sent notification of such filing to:

Samuel A. Cherry
Attorney for Plaintiff
scherry@cochranfirm.com

Lance Harrison Swanner
Attorney for Plaintiff
lswanner@cochranfirm.com

Bernard D. Nomberg
Attorney for Plaintiff
bnomberg@cochranfirm.com

James Kelley
Attorney for Defendant
jkelley@morganlewis.com

Sandra Reiss
Attorney for Defendant
Sandra.reiss@odnss.com

/s/ Robert J. Camp
ROBERT J. CAMP

CONSENT TO JOIN SUIT AS PARTY PLAINTIFF

TO: CLERK OF THE COURT AND COUNSEL OF RECORD

Bennie Walker states the following:
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Perdue Farms at
[Name of plant]
the facility located in Dothan AL. I worked at this location from
[City/State]
12-15-93 to 10-15-06.
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Perdue plant in Dothan, AL. and
[Name of Plant] [City/State]
possibly other plants owned by Perdue. If brought as a class
[Name of Plant]
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 19 day of December 2006.

Bennie Walker
[PRINT NAME]

Bennie Walker
[SIGNATURE]

CONSENT TO JOIN SUIT AS PARTY PLAINTIFF

TO: CLERK OF THE COURT AND COUNSEL OF RECORD

RAY CHARLES STARKS states the following:
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by PER DUE FARMS at
[Name of Plant]
the facility located in DOTHAN ALABAMA. I worked at this location from
[City/State]
MAY. 12, 1994 to 11/24/2006.
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre-and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the PER DUE FARMS plant in DOTHAN ALABAMA and
[Name of Plant] [City/State]
possibly other plants owned by Perdue Farms. If brought as a class
[Name of Plant]
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 21st day of Feb., 2007.

RAY C. STARKS
[PRINT NAME]

Ray C. Starks
[SIGN NAME]

CONSENT TO JOIN SUIT AS PARTY PLAINTIFF

TO: CLERK OF THE COURT AND COUNSEL OF RECORD

Jacovelene Stanford states the following:
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Perdue Farms at
[Name of plant]
the facility located in Dothan AL. I worked at this location from
[City/State]
7/2003 Mar 01 to Sept 2006. ~~still there~~
[Date] [Date, or if still working write "present"]
Present
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Perdue Farms plant in Dothan AL, and
[Name of Plant] [City/State]
possibly other plants owned by Wayn farms. If brought as a class
[Name of Plant]
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 25 day of Sept, 2006.

Jacovelene Stanford Jacovelene Stanford
[PRINT NAME] [SIGNATURE]

CONSENT TO JOIN SUIT AS PARTY PLAINTIFF

TO: CLERK OF THE COURT AND COUNSEL OF RECORD

Tyrone Murrell states the following:
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Produce Farms at
[Name of Plant]
the facility located in Dighton, AL. I worked at this location from
[City/State]
1-26-03 to 6-9-06.
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Produce Farms plant in Dighton, AL, and
[Name of Plant] [City/State]
possibly other plants owned by Produce Farms. If brought as a class
[Name of Plant]
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 12 day of February, 2007.

Tyrone Murrell
[PRINT NAME]

[Signature]
[SIGN NAME]

CONSENT TO JOIN SUIT AS PARTY PLAINTIFF

TO: CLERK OF THE COURT AND COUNSEL OF RECORD

Cwendolyn Michelle Lee states the following:
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Perdue Farm at
[Name of plant]
the facility located in Dothan, AL. I worked at this location from
[City/State]
08/09/04 to Present.
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre-and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Perdue Farm plant in Dothan, AL, and
[Name of Plant] [City/State]
possibly other plants owned by Perdue Farm. If brought as a class
[Name of Plant]
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 15 day of October, 2006.

Cwendolyn M. Lee
[PRINT NAME]

Cwendolyn M. Lee
[SIGN NAME]

CONSENT TO JOIN SUIT AS PARTY PLAINTIFF

TO: CLERK OF THE COURT AND COUNSEL OF RECORD

Annie Martha Hodge states the following:
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Perdue Farms at
[Name of plant]
the facility located in Dothan, Al. I worked at this location from
[City/State]
April 9-27-06 to 4-27-06 Present
[Date] [Date, or if still working write "present"] as
3. I understand that this suit is being brought to recover compensation for pre-and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Perdue Farms plant in Dothan, Al. and
[Name of Plant] [City/State]
possibly other plants owned by Perdue Farms. If brought as a class
[Name of Plant]
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 27th day of Sept., 2006. as

Annie Martha Hodge
[PRINT NAME]

Annie Martha Hodge
[SIGN NAME]

CONSENT TO JOIN SUIT AS PARTY PLAINTIFF

TO: CLERK OF THE COURT AND COUNSEL OF RECORD

CAROLYN COCHRAN

[Print Name]

states the following:

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by PERDUE FARMS at the facility located in DOHAM ALABAMA. I worked at this location from NOV. 3 - 2003 to PRESENT.
[Name of plant] [City/State] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the PERDUE FARMS plant in DOHAM AL., and possibly other plants owned by PERDUE FARMS. If brought as a class action under either federal or state law, I agree to be a named Plaintiff in such class.
[Name of Plant] [City/State] [Name of Plant]

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 9th day of September 2006.

CAROLYN COCHRAN
[PRINT NAME]

Carolyn Cochran
[SIGNATURE]